

UNITED STATES DISTRICT COURT

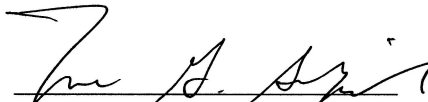
SOUTHERN DISTRICT OF NEW YORK

CARLOS JOSE ZAVALA VELASQUEZ
Petitioner,

Application Granted. Petitioner's reply shall be filed on or before **March 2, 2021**. The Clerk of the Court is directed to mail a copy of this Order to Petitioner at the address listed on the attached envelope. The Clerk of the Court is further directed to terminate the letter motion at docket number 474.

Dated: December 2, 2020
New York, New York

vs.


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

15Cr174 (LGS)

20 Civ. 4328 (LGS)

UNITED STATES OF AMERICA
Respondents

MOTION FOR EXPANSION?EXTENSION OF TIME

Comes noe the Petitioner, CARLOS JOSE ZAVALA VELASQUEZ, pro se pursuant to his Sixth Amendment Right to proceed as pro se litigant. The Movant humbly defers to this Honorable Court to construe this motion as it sees fit to the extent that it does indeed benefit the Movant.

The Court stated "it is well settled that we must construe pro se filings liberally." see for example Simms v. Blot, 543 F3d, 117, 113 (2nd Cir. 2008) citing Haines v. Kener, 40 US 519, 520 (1972) (noting that pro se complaints should be held to a less stringent standard than formal pleadings drafted by lawyers). The Petitioner requests leave to amend this petition to the extent that this Honorable Court sees fit, and he reserves all his rights.

The Court stated in Simms v. Blot, 543 F.3d 117, 133 (2nd Cir. 2008) that the Court should "allow amendments to a pro se litigant's pleadings more freely, see Holmes v. Goldin, 615 F.2d 83,85 (2nd Cir. 1980); Courts should not allow pro se litigants rights to be "impaired by harsh application of technical rules," Traguth v. Zuck, 710 F2d 311 (2nd Cir. 1983)."

The Petitioner requests a ninety day expansion of time, extension to respond to the Respondents' motion, his motion in opposition. This motion may be construed as his affidavit to his unlawful conditions of confinement, see the Federal Bureau of Prisons ("F.B.O.P.") website, which indicates that there is a nationwide lockdown. As a proximate result, the Petitioner does not have a meaningful amount of time in the law library, less than two or three library visits in the entire month. Therefore, there is no adequate access to the Courts, and the Petitioner certainly needs this time to oppose the Respondents' last filing.

Therefore, the Petitioner humbly requests this Honorable Court to grant this motion.

Respectfully submitted,

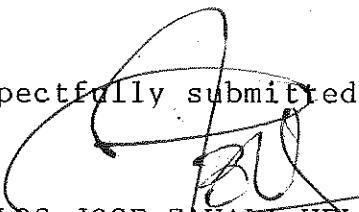
CARLOS JOSE ZAVALA VELASQUEZ
28 USC §1746

October 28, 2020
Date

CERTIFICATE OF SERVICE

A copy of this motion was mailed to the opposing party's counsel via first class US Postal Mail.

Respectfully submitted,


CARLOS JOSE ZAVALA VELASQUEZ
28 USC §1746

October 28, 2020
Date

Carlos Jose Zavala Velasquez
91115054
P.O. Box 26020
Beaumont, TX 77720

October 28, 2020

The Clerk of the Court
US District Court
40 Foley Square
New York, New York 10007

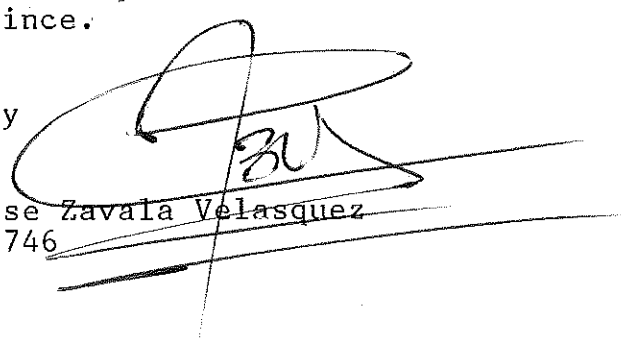
RE: Case No. S4415Cr174 (LGS)

Dear Clerk of the Court Esq.,

My best regards. Enclosed please find my motion to expand time, an extension to oppose the Respondents' last filing. Please return a copy of this same motion stamped as filed, and or any other acknowledgement of this filing, at your very earliest convenience

Please feel free to contact me if I may further clarify, and also inform me of any additional local Court rules that I need to be in compliance.

Very truly



Carlos Jose Zavala Velasquez
28 USC §1746

Carlos Jose Zavala Velasquez
91115054

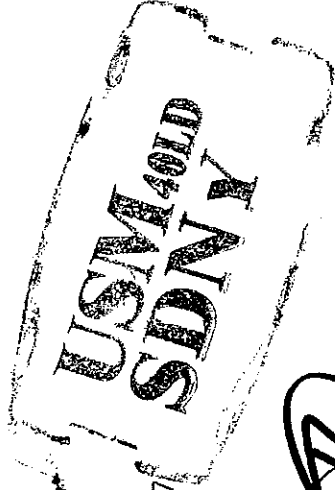
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The Clerk of the Court
US District Court
40 Foley Square
New York, New York 10007



Crim. Encl. to
Esperal Legal Mail

10007-150729

